

July 2, 1999

Agriculture Division

Document Processing Desk -- 6(a)(2)
Office of Pesticide Programs -- 7504C
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460-0001

448750-00

Bayer Corporation
8400 Hawthorn Road
P.O. Box 4913
Kansas City, MO 64120-0013
Phone: 816 242-2000

Subject: Imidacloprid

CAS No. 138261-41-3

44875001

Effects of Three Insecticides on Hatching and Development of Four Amphibian Species
6(a)(2) Submission

Dear Sir/Madam:

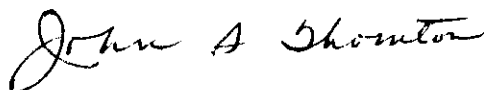
We received the enclosed unpublished manuscript titled "Effects of Three Insecticides (Carbaryl, Chlorpyrifos, and Imidacloprid) on Hatching and Development of Four Amphibian Species, *Rana pipiens*, *Pseudacrus triseriata*, *Ambystoma jeffersonianum*, and *Bufo americanus*" by S. E. Julian and J. H. Howard of Frostburg State University.

The focus of the manuscript is on hatching success and developmental abnormalities. Based on the reporting of the LC50 results, the 48 hr. LC50 for Imidacloprid to a *Rana* sp., or mixture of *Rana* spp., appears to range from 175 to 220 mg/L. This is similar to imidacloprid's toxicity to fish which under EPA's classification scheme would characterize Imidacloprid as practically nontoxic to amphibians. However, since to our knowledge EPA does not have any data on the toxicity of imidacloprid to amphibians, we are bringing these results to your attention in conformance with the reporting requirements of FIFRA 6(a)(2).

If you have any questions concerning this submission, please contact Mr. Melvin Tolliver of my staff at (816) 242-2150.

Sincerely,

**BAYER CORPORATION
AGRICULTURE DIVISION**



John S. Thornton
Director, Product Registrations
and Regulatory Affairs

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Enclosure: Manuscript titled "Effects of Three Insecticides (Carbaryl, Chlorpyrifos, and Imidacloprid) on Hatching and Development of Four Amphibian Species, *Rana pipiens*, *Pseudacrus triseriata*, *Ambystoma jeffersonianum*, and *Bufo americanus*" by S. E. Julian and J. H. Howard of Frostburg State University